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Christine Todd Whitman
Governor

State of New Jersey
Department of Environmental Protection



Robert C. Shinn, Jr.
Commissioner

MEMORANDUM

March 29, 2000

TO: **Christopher Kanakas**, Section Chief
Bureau of State Case Management

FROM: **Andrew C. Marinucci**, Ph.D., Technical Coordinator,
Bureau of Environmental Evaluation and Risk Assessment

RE: **Witco Chemical Company**, Perth Amboy Site
Review of draft *Deed Notice*.

ACM 3/29/2000

Background Information and Site Description

Witco Chemical Corporation is located at 1100 Convery Blvd. in the City of Perth Amboy in Middlesex County. Witco is an active chemical manufacturing facility. At present only its Organic Division operates at the Perth Amboy site. Prior to the 1970's, asphalt was also produced at the site. In 1980, surcharges from the Perth Amboy Sewer were found to contain PCBs. After investigation, it was found that the a major source of this contamination was Witco Chemical. In particular, leaky heat exchangers, which contained PCBs (Aroclor 1248), were the main source of the PCB contamination.

In 1982, soils surrounding the heat exchangers were sampled and removed after extensive PCB contamination was discovered. The excavation was then lined and covered. PCBs were also found in a demolition rubble pile, in an excavation of a former burial site of two large vanadium pentoxide catalytic reactors, in drums from a burial site of waste polyester stearates and surfactants, and soils surrounding a recently removed underground solvent storage tank.

The State of New Jersey filed suit against Witco in 1983 for cleanup of the on-site and off-site (Perth Amboy Sewer system, Spa Spring and Cranes Creek, sewer system surcharge) contamination. Witco responded to this by entering into a Stipulation of Settlement with the State. In this agreement, cleanup levels for PCBs are defined (1-5 ppm depending on the exposure scenario). This settlement places the responsibility on Witco for the investigation and cleanup of its site, the Perth Amboy Sewer site, and other off-site locations. Oversight of the investigation and clean up plan for the Witco site was under the authority of the Witco Committee. A Remedial Investigation/Feasibility Study (RI/FS) showed the approximate extent and nature of PCB contamination as well as other minor contamination at the site. Cleanup goals were established by the Witco Committee and oversight was transferred to the Bureau of State Case Management.

Several phases of remediation were carried out and much of the highly contaminated soils were removed from the site. It become infeasible to remove all contaminated soils, so Witco instituted a series of institutional controls to complete the remediation.

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Review:

Witco Corporation has submitted a draft Deed Notice delineating PCB contamination that is above the NJ Soil Cleanup Criteria (SCC) for potential residential and industrial exposures. The notice is intended to memorialize contamination remains at the site after active remediation. This contamination is prevented from doing harm by a series of engineering controls that prevent exposure of humans to the contamination. In the case of the Witco site, various covers were used. The submitted plan contains detailed maps and a maintenance plan for the engineering controls. To the best of my knowledge, the maps accurately delineate areas that contain elevated PCB contamination that is above the SCC. The maintenance plan, if adhered to, will prevent any exposure to the contamination from normal wear of the cover systems. The submitted documents and drawings are an adequate representation of the technical issues at the Witco Site and need no further revision.

You may contact me at 4-3068 for further clarification.

cc: Frank Camera, BEERA
David Kaplan, BGWPA b

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